

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michael Benjmain Bode
Katie Ann Bode

Debtor 2

CrossCountry Mortgage, LLC

Movant(s)

v.

Micheal Benjamin Bode
Katie Ann Bode

Respondent(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 23-11121-PMM

Matter: Motion for Relief from the Automatic Stay

Document No. 35

**DEBTOR(S)' RESPONSE TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Michael Benjamin Bode and Katie Ann Bode, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.

4. Admitted.

5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.

6. Admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 7; therefore, they are denied.

8. Upon information and belief, the averment as stated in Paragraph 8 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, it is denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: November 2, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, November 2, 2023, I served a true and correct copy of the **Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Michael Farrington, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee
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Philadelphia, PA 19107

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire